



TheMarzettiCompany 

# CODE OF CONDUCT



Being The Better Food Company





### **A Message from our CEO and our General Counsel**

As The Better Food Company, we are committed to continuing our long-standing practice of operating with integrity, in accordance with high ethical standards, and in full compliance with applicable laws. Making consistent ethical decisions in alignment with our values builds trust in each other and with our stakeholders. It also allows us to fulfill our purpose: to nourish growth with all that we do.

Our reputation is the sum of our individual actions, and each one of us, regardless of position, has the responsibility to comply with the principles set forth in these documents. We have worked very hard to build a successful and well-respected company, and we simply cannot – and will not – tolerate unethical or unlawful behavior by anyone working for Marzetti, regardless of job or level.

If you believe this Code of Conduct has been violated, please speak up and follow the reporting procedures in this Code of Conduct. We value those who raise concerns in good faith and have a zero-tolerance policy for retaliation against those who do so.

Each of us is accountable to do the right thing. We ask each of you to join in making a commitment to comply with our Code of Conduct and to demonstrate the highest standards of integrity and ethical conduct in all business activities.



**David A. Ciesinski**  
President, Chief Executive Officer & Director



**Matthew R. Shurte**  
General Counsel & Chief Ethics Officer

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# What Makes Us The Better Food Company

## Our Purpose

To nourish growth with all that we do

## Our Vision

To be the industry leader in creating great tasting food and cultivating deep and lasting relationships

## Our Mission

To make every meal better through high-quality, flavorful food

## Our Values

### Hunger

*We strive for excellence*

We are driven to succeed and passionate about our work, one united team striving to be better.

### Respect

*We are caring*

We respect the dignity of every individual. We actively build and maintain a culture that is better for all.

### Courage

*We are brave*

We are resilient and adaptable, showing courage in the face of adversity and change. We ask tough questions, even when it is difficult.

### Humility

*We learn from others*

We celebrate wins while remaining humble and grateful. We recognize our strengths as well as our opportunities to be better.

## Our Behaviors

### Building the business

through strategic mindset and customer focus

### Executing with purpose

by planning and driving for results

### Developing the organization

through clear communication and by building effective terms

### Nourishing personal growth

through trust and continuous learning

We are constantly striving to make ourselves, our products, and our company better.

**Marzetti**  
The Better Food Company



## How to Use the Code to Make Better Decisions

Our Code of Conduct should serve as a guide to help you make good decisions, but it is general by design and cannot cover every situation. Use common sense and good judgment in applying this Code and consult applicable policies and procedures in specific areas as they apply.

You may encounter some circumstances that are not straightforward. You do not have to become a legal expert to do your part, but it is critical that you seek advice from supervisors, managers, legal counsel, or compliance personnel in these circumstances.

### Are your instincts telling you something is not quite right? Not sure of “the right thing to do”?

When faced with a difficult decision or situation, pause and think about the following:

- Is it legal?
- Does it reflect The Better Food Company values?
- Is it consistent with our Code of Conduct and company policies?
- Is it in the best interests of our people, our customers, consumers, and stakeholders?
- Would I be comfortable if my actions were reported in the news or to my supervisor or the Board?
- Could I justify my actions to my co-workers, friends, and family?

**If your answer to any of the above is “No,” do not do it.**

### If you are not sure, please contact any of the following:

- Your supervisor or manager
- Local or corporate Human Resources staff
- Compliance Department  
[compliance.officer@marzetti.com](mailto:compliance.officer@marzetti.com)  
1-888-502-1185
- The Compliance Help Line (available 24/7 with anonymous reporting options)  
1-888-875-1167 (toll-free, in 175 languages)  
[marzetticompany.com/helpline](http://marzetticompany.com/helpline)

# 1

Introduction

## BEING THE BETTER FOOD COMPANY

Code of Conduct

Adopted August 13, 2025



# Marzetti

The Better Food Company

## Introduction

An abiding commitment to high ethical standards and integrity has served The Marzetti Company and its subsidiaries (“Marzetti”, “we” or “us”) well throughout its history. It is as important today as ever. If we are to be successful in the future and maintain a reputation both for excellence and integrity in everything we do, we must accomplish our objectives in full compliance with applicable laws, accounting rules, and good business ethics. Failure to do so will destroy the trust of our employees and shareholders and may result in disciplinary action up to and including termination.

### 1.1 Purpose

Our Code of Conduct represents the core of how we create a solid foundation of trust and success that is reflected in our relationships with our stakeholders and each other.

### 1.2 Who the Code Covers

This Code applies to everyone working for Marzetti, regardless of job or level, from our Board of Directors to each of the officers and employees of Marzetti and its subsidiaries. Managers have a special responsibility to act as role models and are responsible for promoting a culture of compliance. This Code also applies to our contractors and temporary colleagues in some circumstances.

## Our Code of Conduct is designed to deter wrongdoing and to promote:



### 1.3 What We Expect From You

As a part of Marzetti, you are expected to comply with both the letter and the spirit of our Code, even if you feel pressured to do otherwise. You should not attempt to achieve indirectly, through the use of agents or other intermediaries, what is prohibited directly by this Code. The best way to ensure our values and Code are upheld is for each of us to take this as a personal responsibility.

- Be familiar with the Code and consult all applicable policies.
- Live up to our Code.
- Seek guidance if you have questions or concerns.
- Promptly raise concerns about any potential violations of our Code, our policies, or the law.
- Cooperate fully in any investigation of suspected violations of the Code.
- Submit a certification upon request to confirm that you have done all of the above.

## 1.4 Speak Up – Reporting Unethical Behavior

### Obligation to Report

Each of us is responsible for reporting concerns about any violations of this Code or unlawful action by Marzetti, its employees, or stakeholders in our company. Even when you don't have all the details related to a concern, you must report it. You can rest assured that we will treat it seriously, fairly, and promptly. We may refer relevant violations to the authorities where necessary, and violations may result in disciplinary action for those who allow violations of this Code of Conduct or engage in other unacceptable conduct, up to and including termination of employment.

### Reporting Channels

Any known or suspected violation of this Code, our company policy, or criminal or other unethical activity involving Marzetti or its employees should be reported to one of the following:

- Your supervisor or manager
- Local or corporate Human Resources staff
- Compliance Department  
[compliance.officer@marzetti.com](mailto:compliance.officer@marzetti.com)  
1-888-502-1185
- The Compliance Help Line  
[marzetticompany.com/helpline](http://marzetticompany.com/helpline)  
1-888-875-1167

**The Compliance Help Line** is different from the other reporting channels.

- Anonymous reporting is available.
- Reports go only to our Chief Ethics Officer and a few people on our Compliance team.
- Available 24/7.
- Reports can be made verbally or in writing in over 25 languages.

**DON'T KEEP IT  
TO YOURSELF**

**Discuss concerns with your  
supervisor or manager  
immediately.**

# SPEAK UP!



## No Retaliation

We want to foster a culture where employees can speak up on matters of genuine concern without fear of retaliation. Everyone who speaks up must be treated with dignity and respect and cannot be subjected to any form of discipline or retaliation for reporting in good faith. Good faith reporting does not mean that you have to be right when raising a concern; you just have to believe that the information you are providing is accurate.

### Retaliation could include any of the following:



Firing an employee



Not inviting an employee to professional or social activities offered to other employees



Suspending an employee



Making disparaging comments about the employee



Demoting or transferring an employee against their wishes

**To be clear, it is against our Code for anyone to retaliate against you for making a report in good faith. Disciplinary action will be taken against anyone involved in such retaliation.**

Marzetti further encourages a culture where all persons or entities can raise concerns or report violations or suspected violations of law or regulations to governmental agencies and regulatory authorities without fear of retaliation. Any person or organization may:

- communicate, without notice to or approval by Marzetti, with governmental agencies and regulatory authorities;
- participate in any investigation or proceeding that may be conducted by any governmental agency or regulatory authority, including providing documents or other information without notice to Marzetti; or
- receive an award from any governmental agency or regulatory authority in connection with their providing such information or participating in any investigation or proceeding.

This section applies in all situations and is meant to clarify and supersede any and all prior statements, policies, or procedures (including all other sections of this Code), as well as any contracts or agreements made by Marzetti with any person or entity.

## 1.5 Manager Responsibilities

**As a manager, you have a special responsibility to build a culture of trust and high ethics within your team.**

### Be Exemplary

We need you to exemplify our company values and exhibit the highest standards of integrity, because the way you display your commitment to company values and principles sets the standard for your team to follow. Under no circumstances can you ask your team to break the law, or go against our values, policies, or procedures.

### Be Alert

Always be on the lookout for situations or actions that may be unethical or potentially damaging to our reputation.

Be careful to avoid even the appearance that you have approved of unethical actions.

### Be Informative

Help your team understand the seriousness of Marzetti's expectations for ethical conduct.

Communicate your personal support for our company values and purpose and be clear that you expect actions that are consistent with them.

### Be Open

Assure your team that you are willing to listen, even if they have something difficult to say.

Foster an environment where your team members feel comfortable asking questions and expressing their ideas and opinions.

## 1.6 Investigations

Inquiries or calls made in good faith will be welcomed, treated confidentially to the greatest extent possible, and duly investigated by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, and fairly.

### Manager's Role in Investigations

When an employee raises an ethical concern, you must carry out the following actions to affirm their decision to approach you:



#### Listen Carefully

Thank the person for taking the difficult decision of speaking up, even if you disagree with them. Listen closely to what they have to say and show that you're focused on resolving the issue.



#### Escalate to the Right Channels

While you may be tempted to take ownership of the concern, you should be sure to get HR or the Legal Department involved, especially when you have questions.



#### Be Objective

Continue to treat all team members with the same degree of fairness even if they have reported a concern or are the subject of the report.



#### Maintain Confidentiality

To the extent possible, protect the person's privacy.

### Employee's Role in Investigations

If you are involved in an investigation, you are expected to cooperate fully and candidly in the following ways:



#### Report suspicious behavior

instead of engaging in your own fact-finding and interfering in the investigation



#### Cooperate

in internal investigations, audits, accounting reviews, or directions from our lawyers in connection with lawsuits or government investigative proceedings.



**Provide any and all requested documents or records** relating to our company as soon as possible.



**Refrain from destroying or altering** the requested documents or records in any way.



**Comply with all of our policies** regarding confidentiality and sharing of data during remote investigations.



**Report any employees or managers** who display retaliatory behaviors against us or others.

Upon receiving a report (including an anonymous report), those responsible for investigating should:

- Engage only the necessary partners to evaluate the reported concern.
- Keep all information confidential to the extent reasonably possible.
- Treat everyone involved in the internal investigations with dignity and respect.
- Provide regular updates to the reporter to the best extent that they can.
- Take prompt and appropriate action if the report is substantiated and notify those involved in the investigation.

It is a violation of our Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an internal investigation.

### Self-Reporting

Nothing in this Code of Conduct shall be construed as excusing any person from their own misconduct or protecting them from disciplinary action as a result of their self-reporting that misconduct. However, the fact that a person self-reported their own wrongdoing will be taken into consideration in determining an appropriate response.

Anyone who receives a request for information from a governmental authority should contact our Legal Department at 614-396-3070 or [legal@marzetti.com](mailto:legal@marzetti.com) and should not attempt to respond on their own. Marzetti is committed to cooperating with and responding to requests from authorities in a timely and truthful manner. In addition, when legally required or otherwise appropriate, we may, in appropriate circumstances, timely self-report compliance violations to applicable government authorities. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by our Legal Department or their designees.

 **Learn More**  
[Record Retention Policy](#)

## 1.7 Compliance with Laws

We must be aware of, and never intentionally violate, applicable laws and regulations. We must also be alert to changes in the law or new requirements that may affect our business unit.

Violating applicable laws, regulations, or this Code, policies or procedures, or encouraging others to do so, exposes us to risk, including risk to Marzetti's reputation, and therefore may result in disciplinary action up to and including termination of employment. Violating laws or regulations may also result in legal proceedings and penalties including, in some circumstances, civil and criminal penalties that could affect you personally.



# 2

## Being The Better Food Company with Our **CONSUMERS**



### 2.1 Product Safety

Marzetti takes pride in manufacturing products that are safe for consumption and comply fully with applicable food quality and safety laws. Our products must comply fully with the laws and regulations governing our manufacturing operations, including those issued by the FDA and the USDA where applicable. In the event of a recall or potential recall by the FDA, our policy is to comply fully and to take all appropriate action to protect consumers. You must notify the appropriate senior manager, the plant manager, and the Legal Department immediately if you believe that consumer health or safety is at risk or that notice to a regulatory agency may be appropriate.

### 2.2 Advertising and Public Communications

Our marketing, advertising, and sales materials must be accurate, not misleading, and supported by appropriate data. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. You must make every effort to avoid advertising that might mislead or confuse a typical consumer.

Sometimes you may want to make comparisons between our products and our competitors. If you do so, you must make factual and accurate statements that can be easily verified or reasonably relied upon. It is never appropriate to disparage the products or services of other companies.

You must direct any media requests to our Corporate Communications Department. Requests from financial analysts, stockholders, and industry analysts should be directed to Investor Relations by emailing [ir@marzetti.com](mailto:ir@marzetti.com).

You may not give the impression that you are speaking on behalf of Marzetti in any communication that may become public unless specifically authorized to do so by our Communications Department or Investor Relations. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor, and endorsements of products or services.



**Learn More**

[Social Media Policy](#)

# 3

## Being The Better Food Company with Our **SHAREHOLDERS**



### 3.1 Financial Integrity

We maintain our accounting records in accordance with generally accepted accounting principles. But even more, we will be forthright with information about our financial results so that our investors receive a clear picture of company performance.

You are required to report timely to Marzetti's senior management all information in your possession that may be necessary to ensure that Marzetti's financial reports are full, fair, and accurate.

- We will maintain our accounting records so that our business results are presented fully, fairly and accurately in accordance with generally accepted accounting principles.
- We will not misrepresent our true financial performance.
- We will strive for clarity and candor in all financial reports.
- Truthfulness and candor are expected in all of our business dealings, including dealings with management, our auditors, our lawyers, and our shareholders.

### Anti-Money Laundering

We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Q :

How can I avoid transactions that unintentionally involve money laundering or unlawful diversion?

A :

Be alert for the following red flags:

- Requests for cash payment, travelers checks, or checks from an unknown third party
- Complex payment patterns
- Unusual transfers to or from countries not related to the transaction
- Customers who seem eager to avoid recordkeeping requirements
- Transactions involving locations previously associated with money laundering or tax evasion
- Transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity

Please contact the Legal Department if you see a red flag and have any questions about how to proceed.

Q :

Can I give financial information about Marzetti to my investment advisor? What about an investment research firm or "expert network" that assures me it will make the data anonymous?

A :

You may not share confidential information for the purpose of research, analysis, or investment opportunities in any publicly traded company, regardless of whether the information provided is confidential or sensitive, unless you get approval from the Chief Executive Officer or the General Counsel of Marzetti. This prohibition includes confidential information regarding sales and financial results that would not, by itself, be considered material.



Learn More

[Travel & Expense Policy](#)  
[Procurement Policy](#)

## 3.2 Conflicts of Interest

A “conflict of interest” occurs when your private interest in any way interferes or appears to interfere with the interests of Marzetti. you are expected to avoid all situations that might lead to a real or an apparent conflict between your or your immediate family’s self-interest and your duties and responsibilities as an employee, officer, or director of Marzetti.

“Immediate Family” for purposes of this Code includes your spouse, parents and stepparents, children and stepchildren, siblings, in-laws, and anyone who resides in such person’s home.

You must disclose to the Legal Department any material transactions or relationships that reasonably could be expected to give rise to a real or apparent conflict of interest. The Board of Directors will resolve conflicts of interest involving a director, the CEO, or an executive officer.

### Conflicts of interest would include you or your immediate family:

- Serving as an officer, partner, employee or agent for any competitor, supplier, or customer of Marzetti.
- Having substantial financial interest in a company which does business with, competes with, or seeks to do business with Marzetti. An interest will be considered substantial if it represents more than 5% ownership of the other entity or provides significant benefit to you or your immediate family member.
- Working for a vendor or supplier to Marzetti in circumstances where you are in a position to influence the selection of such vendor or supplier.
- Working a second job, serving on the board of directors, or advising any other company if such work interferes with the performance of your duties to Marzetti. When outside employment is allowed, you must still protect Marzetti’s confidential information and follow our policies and procedures relating to confidential or inside information.



 Learn More

[Corporate Governance Principles](#)

Q

•

I was asked to serve on a committee or on the board of an industry group. Can I accept that role?

A

•

**Step 1:** Before agreeing to become a member of the board of directors or an advisory committee of any industry group, you should contact the Legal Department to determine the relationship, if any, existing between Marzetti and the organization. Certain competitive, supplier, or customer relationships would create enough potential for a conflict of interest that your service on that committee would not be permitted.

**Step 2:** If it is cleared by the Legal Department, notify your supervisor of your prospective role before agreeing to the service.

**Step 3:** Remember that you may not conduct outside business during working hours or use Marzetti assets or information in that outside work.



### 3.3 Gifts and Entertainment

Accepting gifts and entertainment from vendors, consultants, and other third parties could influence business decisions or give the appearance of influencing business decisions. The same standards that apply to all of our ethical decisions are relevant here.

**“Gifts and entertainment”** includes anything of value, e.g. discounts, loans, favorable terms on any product or service, services, gratuities, prizes, transportation, use of another company’s vehicles, use of vacation facilities, stocks or other securities, participation in stock offerings, home improvements, tickets, and gift certificates. This list is not exhaustive.

A good rule of thumb is that if you are uncomfortable regarding a gift or relationship, you should get prior approval from the Legal Department. You can contact them by calling 614-396-3070 or emailing [legal@marzetti.com](mailto:legal@marzetti.com).

Q :

Can I hire my relative or recommend them for employment at Marzetti?

A :

You are welcome to recommend your relatives for employment, and we will consider them based on their qualifications for the job. To avoid a conflict of interest, though, you may not have a direct or indirect reporting relationship with any relative.

**We consider the following to be a “relative”:**

- Immediate Family (as defined in Conflicts of Interest).
- Domestic partners (whether or not officially recognized under local law) and intimate or romantic partners.
- Grandparents and grandchildren.
- Nephews, nieces, aunts and uncles.

Contact the Legal Department for guidance if you are not sure if a person is a “relative.”

You must inform Human Resources and the Legal Department if:

- You have a relative working for Marzetti.
- You want to hire a relative of a member of management.
- You have an intimate or romantic relationship with another employee.

Q :

Can I accept discounts on personal purchases of a supplier or customer’s products or services?

A :

Only if such discounts are offered to all Marzetti employees.

Q :

Can I accept a gift card from a supplier?

A :

You should not accept gift cards that effectively function as cash (e.g. Amazon gift cards).

### **Gifts of cash are always prohibited.**

No gifts, gratuities, or services of more than nominal value should be accepted and then only infrequently and after receiving approval from the Legal Department. As a rule of thumb, if the value is more than customary it should be considered more than nominal value.

#### **Commercial Customers**

You may provide meals, entertainment, and gifts to commercial customers provided that you do so infrequently and they are of nominal value, are customary under the circumstances, and do not violate the law or policies of the customer. Avoid providing any meals, entertainment, or gifts if it is likely that their public disclosure would embarrass Marzetti or the recipient. When giving gifts or offering to entertain a business partner, you must ensure that our offer does not violate the recipient's own policies.

#### **Public Officials**

When working with public officials, you must be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. You must contact the Legal Department before providing any gift or entertainment to a public official.

#### **Bribes.**

Under no circumstances will we give or accept bribes while conducting business with government agencies, customers, suppliers, or any independent contractor or agent acting on our behalf. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. No matter where we are working in the world, there is an applicable anti-bribery law or policy, such as the Foreign Corrupt Practices Act (FCPA) in the U.S.

- Only work with business partners who have a reputation for integrity, and report any signs that a representative is unethical or could be paying a bribe.
- Avoid participating in kickbacks. Kickbacks are agreements to return a sum of money to a third party in exchange for making or arranging a business transaction.
- Report any payment that could appear to be a bribe to the Legal Department in writing. Never assume or conclude that such a payment does not present a problem or that it can be addressed appropriately without receiving prior written confirmation from the Legal Department.



## **Learn More**

[Gift Policy](#)

[Anti-Bribery Policy](#)

[Insider Trading Policy](#)

## **3.4 Insider Trading**

You and your immediate family members must avoid insider trading of Marzetti securities—or those of any other companies—based on material nonpublic information you learn through your job. Insider trading is both unethical and illegal and may result in severe legal penalties.

“Insider trading” is buying or selling stock when you have material inside information, whether concerning Marzetti securities or the securities of any other company. “Material inside information” is nonpublic information about anything that could affect a company's stock price or be considered material by a person in considering the purchase or sale of such stock.

Examples of material inside information:

- the existence of negotiations on an important transaction
- a prospective merger, acquisition, or a stock split
- a substantial contract award or termination
- a significant product development
- the gain or loss of a significant customer or trademark license
- material changes in the trend of Marzetti's sales or earnings

Any questions concerning the propriety of effecting a transaction in Marzetti's (or other company's) securities should be directed to Marzetti's Legal Department. All directors, officers, and other employees shall comply with the Insider Trading Policy.

#### **Stock Tips.**

If you disclose confidential information about a company to someone who proceeds to buy or sell that stock, you could be found guilty of aiding and abetting in insider trading even if you received no financial benefit.

# Q :

**When can I safely trade in Marzetti stock?**

# A :

If you have received pre-approval from the office of the General Counsel, you can typically trade during the open window that begins three business days after our financial results are released to the public each quarter. If you have material inside information at that time, however, you are still prohibited from trading.

# 4

## Being The Better Food Company with **INFORMATION**



### 4.1 Confidentiality

You may know or become aware of nonpublic information regarding Marzetti or its business, employees, customers, or suppliers. To maintain the respect and trust of our stakeholders, we must protect confidential and sensitive information entrusted to us.

You must treat nonpublic information in a reasonable, careful, and diligent manner to avoid disclosure of proprietary or business information in any illegal or inappropriate manner. That information is confidential and should not be shared with outsiders, family members, or even with other coworkers unless they have a genuine need to know basis in the course of their work. For example, providing Marzetti's financial information to Marzetti's insurance company as required for underwriting purposes would not be prohibited by this Code.

Confidential information includes financial documents, business plans, sales data, personnel files, cost of materials, manuals and procedures, computer software, contracts, supplier information, new product pipelines and a host of other information.

#### General rules:



If you suspect information is confidential, it probably is and requires protection.



Use confidential information only for the intended business purpose, in a private setting, with those who need to know.



Confidential information may only be shared with third parties that have controls to manage the flow of information and that have agreed in writing to keep the information confidential.



Your obligation to keep all information confidential continues even if your employment with Marzetti ends.



Sales and financial results are confidential, even if the information, by itself, would not be considered material.

Any documents, papers, records, or other tangible items that contain trade secrets or proprietary information are Marzetti's property and may not be retained after employment, must be used on Marzetti's systems, and may not be exported to personal accounts or devices. Records must be maintained and destroyed in accordance with the Record Retention Policy.

Records should never be destroyed if litigation or a governmental investigation is pending or threatened. If you are notified of such an event, you must take immediate steps to preserve records including e-mail records and other records stored on the computer, tablet, phone, or any device you work from and cooperate with Marzetti on all such legal matters, including producing documents and participating in interviews or meetings as requested by Marzetti's Legal Department or external legal counsel.

If you are not sure whether any information you possess is covered by this Code or company policy or whether the person or entity requesting the information is covered, contact the Legal Department before releasing the information.

## 4.2 Data Privacy

We must handle personal data responsibly and in compliance with all applicable privacy laws and company policies. Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information.

If you handle the personal data of others, you must:

- Act in accordance with applicable laws
- Act in accordance with any relevant contractual obligations
- Collect, use, and process such information only for legitimate business purposes
- Provide clear and accurate privacy notices when collecting or processing personal data
- Limit access to the information to those who have a legitimate business purpose for seeing the information
- Securely store, transmit, and destroy personal information in accordance with applicable policies and laws
- Take care to prevent unauthorized disclosure



## Learn More

[Record Retention Policy](#)

[Retention Schedule](#)

[Privacy Policy](#)

### 4.3 Intellectual Property

Our intellectual property is among our most valuable assets. We must take appropriate steps to protect our trademarks and those of our licensors and avoid any violation of another party's intellectual property rights. We must always safeguard trade secrets and obtain patents where appropriate.

- Your work product and inventions made in the scope of your employment are the property of Marzetti.
- You should contact the Legal Department when you are contemplating using a new trademark or anything that may be patented so that a determination of the availability of a registration may be made prior to the development of labels, advertising materials, or novel products.

You should always use our trademarks and service marks exactly as they are registered. This includes correct spelling, colors, grammatical use (always as an adjective in copy, and never as a noun), and use of registration symbols. Registered marks should show the ® symbol. Remember that inappropriate use of trademarks over an extended period of time could jeopardize our rights in the marks.


- If you see an unauthorized use of Marzetti trademarks, notify the Legal Department immediately, as it could be the basis for loss of the trademark registration.
- Do not use any other party's trademarks without first obtaining written permission.
- Do not copy licensed software products or use any software in the course of your employment in violation of a third party's rights.

### 4.4 Artificial Intelligence

You are authorized to use AI for work-related purposes, pursuant to the guidelines set forth in our Generative Artificial Intelligence Permitted Use Policy.

- Always review the AI responses for accuracy before using them.
- Do not use AI to generate content that is discriminatory, offensive, harassing, or inappropriate.
- Do not enter any confidential, personally identifiable, or trade secret information into an AI tool.
- Do not use AI to make employment decisions.



 **Learn More**  
GenAI Policy

# 5

Being The Better Food Company with  
**EACH OTHER**



## 5.1 Health and Safety

We are committed to providing a safe and healthy workplace for employees, along with other visitors to our premises. Our commitment is demonstrated by operating in full compliance with applicable laws and regulations as well as policies and procedures designed to safeguard health and safety and protect the environment. We consider these safeguards when designing our facilities and equipment and in our training on appropriate industrial hygiene practices, use of protective equipment, and emergency preparedness.

You are an important part of maintaining our safe workplace and we need you to observe all safety and health rules and regulations, practices, and laws, including occupational safety and health standards, that apply to your job, and take precautions necessary to protect yourselves, your co-workers, and visitors. You are also responsible for immediately reporting accidents, injuries, occupational illnesses, and unsafe practices or conditions to your supervisors.

### Drug-Free Workplace

We will continue to maintain a workplace free from illegal drugs and controlled substances. You are not permitted to be under the influence of any legal or illegal substances (except properly prescribed medications) on our premises, while on company business, or during work hours and employees are prohibited from manufacturing, soliciting, distributing, possessing, or using any illegal drugs or substances in the workplace, or while working. This includes the use of alcohol, except when approved by the Chief Executive Officer, Chief Financial Officer, or General Counsel.

### Weapons

To preserve your safety and security, lethal weapons, firearms, ammunition, explosives, and incendiary devices are forbidden on Marzetti premises or in our company vehicles, except as permitted by law and where needed by law enforcement officers or authorized security personnel. Threats, acts of violence, and physical intimidation are strictly prohibited, and no joking about violence will be tolerated.



## Learn More

[Workplace Violence Policy](#)  
[Drug-Free Workplace Policy](#)

## 5.2 Fair Employment Practices

### 1. No Forced Labor

We will comply with applicable labor and employment laws and will strive to provide a safe workplace that respects the dignity and needs of each individual. Marzetti will not engage in or support forced, bonded, indentured, or slave labor or human trafficking. All labor must be voluntary, and workers must be free to leave employment after any applicable reasonable notice.

### 2. No Hazardous Work by Minors

We will not employ individuals under the age of 18 in hazardous work. All work by minors must comply with applicable laws and ensure safety and well-being.

### 3. Eligibility to Work / Identification Papers

We will verify the legal work status of all employees in compliance with applicable laws and regulations and will not retain original identification documents, except as required for verification purposes.

### 4. Compensation and Benefits

We will pay wages and benefits that meet or exceed legal minimums and collective bargaining agreements. Wage deductions must be lawful and transparent.

### 5. Work Hours and Breaks

We will comply with legal limits on working hours and provide required rest and meal breaks.

### 6. Freedom of Association

We will respect workers' rights to associate freely, join labor unions, and engage in collective bargaining without retaliation.



## Learn More

[Corporate Employee Handbook](#)  
[Facility Employee Handbook](#)

### 5.3 Anti-Harassment and Anti-Discrimination

You and each of your team members deserve to be treated with fairness, dignity, and respect. We will not tolerate discrimination or any type of harassing conduct at work or in any work-related setting (including on social media or other digital platforms). This includes slurs, jokes, intimidation, or any other verbal or physical attack upon a person based on race, nationality, or religion and unwelcome sexual advances or other verbal or physical conduct of a sexual nature.

### 5.4 Equal Employment Opportunity

Employment decisions such as recruitment, hiring, development, and promotion are based on performance. We strictly prohibit and do not tolerate discrimination or harassment against employees or any other covered persons because of race, color, national origin, citizenship, ancestry, religion, gender, pregnancy, age, physical or mental disability, genetic information, military or veteran status, or any other classes or characteristics protected by applicable federal, state, or local law.



### 5.5 Personal Information Privacy

We respect the confidentiality of employee personal information and take reasonable steps to ensure that it is reasonably secured, shared only when there is a legitimate and lawful reason to do so, and accessible only by appropriate and authorized personnel. Requests for confidential personal information from anyone outside our company under any circumstances must be approved in accordance with our policies.


It is important to remember, however, that you should have no expectation of privacy with regard to your use of Marzetti resources for any purpose (e.g., systems, networks, devices, etc.) including but not limited to your communications, or any personal property you bring onto Marzetti premises or use for Marzetti business.

### 5.6 Inappropriate Computer Use

You must refrain from the following:

- Using electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.
- Using electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.
- Using Marzetti electronic media for non-business purposes, in ways that do not comply with our policies.

Remember: Transmitting company data without authorization, accessing inappropriate internet sites, and sending inappropriate e-mails are examples of inappropriate computer use.

 **Learn More**

- [Anti-Harassment Policy](#)
- [Sexual Harassment Policy](#)
- [IT Security and Acceptable Use Policy](#)
- [Virtual Desktop Policy](#)

# 6

## Being The Better Food Company with Our **COMMUNITIES**



### 6.1 Environmental

#### **Marzetti is committed to protecting the environment.**

Our facilities are to be operated in full compliance with all applicable laws and regulations designed to protect the environment. Environmental responsibilities must be taken into consideration in designing our plants and equipment.

Waste shall be disposed of responsibly in full compliance with law. Efforts must be made to minimize the creation of waste - particularly hazardous waste.

- We use energy wisely and efficiently, minimizing waste wherever we can.
- We ensure that our products have no undue adverse environmental impact, are safe for their intended use, and can be disposed of safely.
- We educate employees whose work affects environmental compliance with the permits, laws, and regulations that apply to their work.
- We educate and engage our employees and inform external stakeholders in our environmental efforts.
- We contribute to and partner with organizations that work towards environmental goals.
- We engage our supply chain in supporting our sustainability efforts.

Efforts must be made to achieve the efficient use of energy and materials and the minimization of adverse environmental impact and waste generation.



#### **Learn More**

[Environmental Policy](#)

[Contractor Work Rules Policy](#)

## 6.2 Philanthropy

Marzetti is a vital part of the communities that host our facilities. We support development in the communities in which we work and throughout the world.

- We participate in many humanitarian and charitable endeavors through community partnerships, volunteer efforts, cash donations, charity drives, and mentoring programs.
- We encourage you to give back to our communities by volunteering with organizations, donating to causes, or participating in company outreach efforts, so long as:
  - All contributions and charity efforts are legal and ethical.
  - Company resources are not used to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Marzetti.
  - Approval from Corporate Affairs is obtained before using company resources, acting as a company representative, or donating anything in Marzetti's name.
  - Approval from the Legal Department is obtained before assuming a leadership position at any charitable or other non-profit institution, to determine the relationship, if any, existing between our company and the organization.

## 6.3 Political Contributions and Activity

**Company Activity:** Decisions about political contributions or actions on behalf of Marzetti require approval from our Corporate Affairs department. You may not contribute company funds or other company assets or communicate with legislators using our name or letterhead for political purposes, except as approved by the Chief Executive Officer, the General Counsel, or the Vice President of Government Relations. No Company funds will be expended to support individual candidates. If you are contacted regarding Marzetti's position on public issues, you should decline to respond and refer the inquiry to the Corporate Communications Department or Government Relations, as applicable.

**Personal Activity:** You are encouraged to exercise your right to vote and participate in political activities in a manner consistent with all relevant laws and our policies. To ensure that we maintain transparency, honesty, and integrity with our stakeholders and each other, your personal political activities must occur outside normal business hours and with no use of Marzetti's name, facilities, or corporate funds, except as approved by the Chief Executive Officer, the Chief Financial Officer, or the General Counsel.

**You must ensure that the Company is not affected by your personal political views or choices in political contribution.**



Never contact lawmakers on behalf of the company or lobby with lawmakers for the company's interests without getting explicit approval from Government Relations or the Legal Department.



Do not conduct political activities on company time or use company resources such as any of its names, brands, logos, telephones, computers, or other supplies.



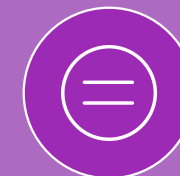
Respect your colleagues even if their political opinions are different from yours— you must not force your views on them.



Do not use the company letterhead, company e-mail, or reference our business address or title when expressing a personal view in a public forum (such as a letter to the newspaper).



Consult with Government Relations and the Legal Department before running for public office or committing to a candidacy or a formal position on a campaign committee.



All employees should be treated fairly, regardless of their political beliefs.

# 7

## Being The Better Food Company with Our **COMPETITION**



### 7.1 **Antitrust and Unfair Competition Laws**

We are committed to operating in a competitive environment in compliance with all applicable antitrust laws. Violation of these laws can damage our reputation and result in significant civil and criminal penalties.

- Never agree to, or even have discussions about, fixing prices or conditions of sale, rigging bids, submitting “safe” or “cover” bids, limiting production, or allocating markets or customers with suppliers, customers, or competitors.
- Do not discuss customers, prospects, discounts, marketing plans, contract strategies, or other business terms with any employees or representatives of our competitors.
- Avoid communications, including those at trade shows and industry association meetings, or agreements with competitors that could create the appearance of collusion. All such contacts must have a legitimate business purpose.

Agreements with competitors do not need to be written in order to violate antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. In the U.S., for instance, antitrust violations may be prosecuted criminally as felonies and can result in severe penalties for Marzetti and any employee or other person who participates in a violation.

Contact the Legal Department with any questions.



## 7.2 Competitive Information

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. You may also gain competitive information appropriately by obtaining a license to use the information.

Depending on the business justification and the effect on competition, other practices not involving competitors may result in civil violations of antitrust and competition laws. These practices include:

- Exclusive dealing
- Bundling/package offerings
- Resale restrictions
- Selective discounting

You should recognize that the law generally prohibits discrimination in pricing or promotional programs for customers who compete with each other and who are purchasing the same product. Special pricing may be permitted to meet competition, but you must maintain documentation consistent with any company guidelines.

You should contact the Legal Department when you have any questions or when you are:

- determining territorial or customer assignments among distributors,
- engaging or terminating a distributor,
- requiring a joint sale of more than one product, or
- considering unusual or exclusive dealing arrangements.



**Learn More**

[Antitrust Compliance Policy](#)

## Code Administration and Enforcement

### Violations

Employees, officers, and directors of Marzetti are expected to follow this Code at all times. Failure to comply with this Code may result in disciplinary action up to and including termination. Any supervisor, manager, officer, or director who directs, approves, or condones infractions, or has knowledge of them and does not promptly report and correct them, will be subject to disciplinary action up to and including termination.

### Enforcement

This Code shall be administered and monitored by Marzetti's General Counsel. For purposes of our Policy on Policies, the "Approving Corporate Officials" for this Code shall be the Board of Directors. Any questions or requests for further information about this Code should be directed to the Legal Department.

In the event of any violation of any criminal statute, we may make appropriate disclosure to regulatory enforcement agencies regarding such violation and the steps taken to remedy and prevent recurrence of such violation. Marzetti's Board of Directors requires regular reporting regarding the level of compliance with this Code and with applicable provisions of law.

### Exceptions

Requests for any exceptions to this Code must be submitted to and reviewed by the Legal Department. The Company will maintain records of each exception and any mitigating controls that were implemented.

Any waivers of this Code for directors or executive officers of Marzetti may only be authorized by the Board of Directors, in each case in its discretion. Any waiver for a director or executive officer will be disclosed as required by law or applicable listing rules.

### Review and Changes

This Code shall be reviewed periodically. We expressly reserve the right to change, modify, or delete the provisions of this Code without notice. All employees are responsible for consulting and complying with the most current version of this Code.

### Training

Training shall be conducted when an employee commences their employment, annually after that, when there is a substantive change in this Code, or as otherwise deemed necessary by the General Counsel or Director of Compliance.

### Posting Requirement

Marzetti shall post this Code on its website as required by applicable rules and regulations. In addition, Marzetti shall disclose in its proxy statement for its annual meeting of stockholders or, if Marzetti does not file a proxy statement, in its Annual Report on Form 10-K, that a copy of this Code is available both in print to any stockholder who requests it and on our MarzettiCompany.com website.

### Revision History

Our Standards of Conduct and our Code of Business Ethics are no longer in effect as of the effective date of this Code. This Code was approved by the Compliance Committee on August 7, 2025 and by the Board of Directors on August 13, 2025.

